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March 1, 2013

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

***Ex Parte Notice***

*Wireless Telecommunications Bureau Seeks Comment on Request for Waiver and Extension of Time to Construct 700 MHz A- and B-Block Licenses, **WT Docket No 12-332**, Promoting Interoperability in the 700 MHz Commercial Spectrum, **WT Docket No 12-69**, Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, **WT Docket No 12-268***

Dear Ms. Dortch:

On Wednesday, February 27, 2013, Shirley Bloomfield and the undersigned, on behalf of the National Telecommunications Cooperative Association (“NTCA”), met with Ruth Milkman, Jim Schlichting, Roger Noel, Lloyd Coward, Becky Swartz, and Brian Regan from the Wireless Telecommunications Bureau to discuss the challenges small, rural telecommunications carriers face in the provision of wireless service to their subscribers.

NTCA noted that its members are appreciative of the extension of the construction deadline for 700 MHz A-Block holders, but noticed that many small company B-block license holders are having similar difficulties meeting the looming benchmark and would likewise benefit from an extension. We explained that the landscape has changed dramatically since the licenses were acquired and that increased consolidation within the industry has made it even more difficult for rural providers to obtain roaming deals. It was pointed out that some members have reached out to attempt to negotiate data roaming arrangements, but the large carrier will not negotiate, instead offering to buy the spectrum. We noted that the lack of interoperability between the spectrum bands limits options. NTCA also discussed the difficulties small providers have in obtaining handsets necessary to offer a mobile product using the spectrum.

Many NTCA members are building and offering a fixed wireless product to their subscribers, but a strict enforcement of the initial construction benchmark may force some members to use their scarce resources to build out for the sole purpose of holding on to an intact spectrum asset, rather than providing top quality service.

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NTCA urged the Commission to grant 700 MHz B-Block license holders an extension that will keep A- and B-Block licenses on the same construction schedule. NTCA said it would follow up with the Bureau and provide more information about the unavailability of handsets.

NTCA also discussed the 600 MHz spectrum, urging the Commission to license the reclaimed spectrum in a manner that encourages small company participation, pointing out that Economic Area (EA) licenses are generally too large to provide a meaningful spectrum opportunity to small, rural telecommunications providers.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2020 or [jcanfield@ntca.org](mailto:jcanfield@ntca.org).

Sincerely,

/s/ Jill Canfield

Jill Canfield

Director, Legal & Industry

and Assistant General Counsel

cc: Ruth Milkman  
Jim Schlichting  
Brian Regan  
Becky Schwartz  
Lloyd Coward  
Roger Noel